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## EXHIBIT C

## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

BETTY ANNE WATERS, AS Administratrix of the Estate of KENNETH WATERS,

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Plaintiff

CIVIL ACTION NO. 04-CV-10521-GAO

VS

TOWN OF AYER, NANCY TAYLOR-HARRIS, In Her Individual Capacity, ARTHUR BOISSEAU, In His Individual Capacity, BUDDY DECOT, In His Individual Capacity, WILLIAM ADAMSON, In His Individual Capacity, PHILIP L. CONNORS, In His Individual Capacity, AND JOHN DOE AND JANE DOES 1-16, In Their Individual Capacities, Defendants

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REPORTER'S TRANSCRIPT OF PROCEEDINGS RE SCHEDULED DEPOSITION OF ROSEANNA BAGGESEN A/K/A ROSEANNA PERRY A/K/A ROSEANNA C. PETERSON A/K/A ROSIE A. PERRY

BE IT REMEMBERED that, pursuant to Notice of Taking Deposition, and on Friday, May 4, 2007, commencing at the hour of 11:07 a.m., thereof, at the offices of Kopelman and Paige, 101 Arch Street, Boston, Massachusetts, before me, Kathleen M. Benoit, Professional Shorthand Reporter and Notary Public in and for the Commonwealth of Massachusetts, the following proceedings were had.

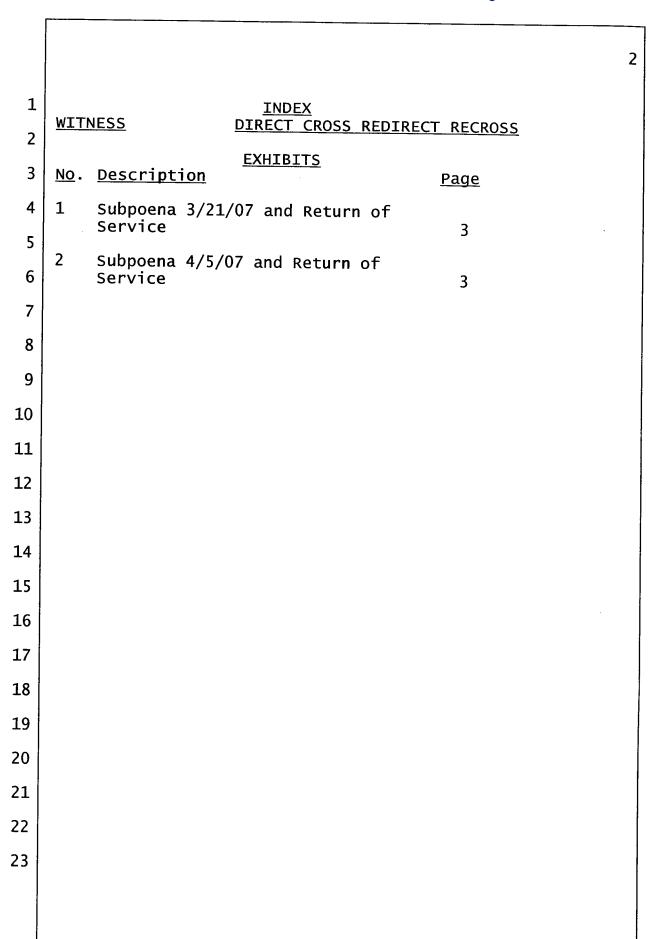
## **APPEARANCES:**

JOSEPH L. TEHAN, JR., ESQ., Kopelman and Paige, P.C., 101 Arch Street, 12th Floor, Boston, MA 02110, For the plaintiff

Leavitt Reporting, Inc.

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LEAVITT REPORTING, INC.

## PROCEEDINGS

(Exhibit Nos. 1 and 2 marked.)

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MR. TEHAN: For the record, my name is Joseph Tehan. I represent all the defendants in this case. I am here for the deposition of Roseanna Perry who is also known as Rose Anna Perry, two different, a different first and middle name rather than joined as in the first instance, who is also known as Roseanna C. Peterson and as Rosie A. Perry. Finally, I believe she also has an alias of Roseanna C. Baggesen B A G G E S E N.

In order to subpoena Mrs. Baggesen or Miss Baggesen/Perry, to the deposition, we first effected service on her on March 22, 2007, at the address of 15 Fairfield Avenue, No. 1, in Providence, Rhode Island. That service was effected by leaving a copy of the deposition subpoena taped to her door and mailing to her a second copy at that address, and, again, that service was effected on March 22, 2007. The record of that subpoena and return of service have been marked in this deposition as Exhibit 1.

Thereafter, on April 6, 2007, we attempted to effect service once again on our deponent, in this instance at 31 1/2 Bloomfield Street in Pawtucket, Rhode Island. In this instance, the return of service,

which is appended to the subpoena and marked as Exhibit 2, reflects that two attempts at service were made. One was a mailing of the subpoena at the address which I have given, and the second was, again, leaving a copy of the subpoena taped to the door. In this instance, the return of service on April 6, 2007, notes that the address was confirmed by name on mailbox.

The deposition of Ms. Perry was to have proceeded at 10 o'clock this morning. It is now 11:07 by my watch and she has failed to appear and has failed to contact this office in response to the subpoenas. Pursuanto a prior agreement, plaintiff's counsel has remained at his office pending Miss Perry's arrival. He has agreed that since she has not appeared by this time that he authorizes my making the statement which I am now making and that together we will discuss bringing the matter before the court in an attempt to compel her attendance.

(Whereupon the proceedings adjourned at 11:07

a.m.)